ORIGINAL

	BEFORE THE
FEDERAL COMMU	UNICATIONS COMMISSION
WAS	SHINGTON, D.C. RECEIVED - FCC
In the matter of	DOCKET TO THE WAY ORIGINAL OCT -
A1) MB Docket No. 04-318
Amendment of Section 73.202(b) Table of Allotments FM Broadcast Stations) RM-11040
(Culebra, Puerto Rico)	RECEIVED
To: Media Bureau	OCT - 7 2004
	Federal Communications Commission Office of the Secretary

COMMENTS

International Broadcasting Corporation (IBC), by its attorneys, hereby submits its comments with respect to the above-captioned rule making proceeding which proposes the deletion of FM Channel 291B at Vieques, Puerto Rico, and the substitution of FM Channel 291A for Channel 254A at Culebra, Puerto Rico.

The Notice of Proposed Rule Making states that the proposed deletion of Channel 291B at Vieques is necessary to permit the allotment of Channel 291A at Culebra, but that Channel 291B will be retained at Vieques if there is an expression of interest to make application to operate an FM station on this channel.

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IBC believes that because of recent changes in the development of the Vieques area, construction of a new radio station is warranted there. In consequence, it is IBC's intention to apply for such a facility on Channel 291B.

Respectfully submitted,

International Broadcasting Corporation

Bv

Richard F. Swift

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Suite 200

Washington, D.C. 20036-3101

Its Attorneys

October 4, 2004

CERTIFICATE OF SERVICE

I, Denise A. Branson, hereby certify that on this 4th day of October 2004, true and correct copies of the foregoing **COMMENTS** have been served by first class U.S. Mail, postage prepaid on the following:

Scott C. Cinnamon, Esq. Law offices of Scott C. Cinnamon, PLLC 1090 Vermont Ave., NW, Suite 800, #144 Washington, DC 20005 (Counsel for Petitioner)

Denise A. Branson, Paralegal